



MOHAVE COUNTY SHERIFF'S OFFICE



JIM McCABE
SHERIFF

December 12, 2014

Received & Inspected

DEC. 22 2014

DOCKET FILE COPY ORIGINAL FCC Mail Room

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: WC Docket No. 12-375 Second Further Notice of Proposed Rulemaking (Inmate Calling Services)

Dear Ms. Dortch,

As the elected Sheriff of Mohave County, Arizona I am in support of reasonable inmate calling rate and fee reforms and appreciate the efforts of the FCC to protect inmates and their families from paying excessive rates and fees. Of concern to me, however, is the potential elimination of commission payments which are a vital part of the overall jail budget. These monies aide in ensuring inmates entrusted to our custody have unlimited use of the inmate telephone system that is provided as a privilege. I am aware of recent rules implemented in the State of Alabama that require reasonable rates and funding fees, but also allow for continued payment of commissions to jails within the state. I urge the FCC to consider mirroring the overall regulation implemented in the State of Alabama.

Below are just a few of the costs my office incurs in offering inmate phone services to the population confined to the jail:

- Maintaining and monitoring maintenance of the system
- Bandwidth costs associated to administering the inmate phone platform
- Storage of calls utilized for court and legal proceedings
- Live alert transmission costs to call an investigator
- Three-way call detection
- Criminal investigations of inmates charged with a criminal act associated with using the inmate phone system
- Administrative disciplinary hearings and sanctions for inmates who commit a rule infraction while using the inmate phone system
- Calling services for inmates identified as indigent
- No cost calling service to public defenders, consulates, embassies and ombudsmen
- No cost calling service to bail bond companies
- No cost calling service for a newly booked inmate
- Prison Rape Elimination Act (PREA) mandated voicemail systems, handling calls and reporting
- Customer service features for inmates to report workmanship issues with the inmate phone system
- Voice mail feature for family and friends to leave a message for inmates in custody

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List ABCDE

- THREADS – A communications analysis providing actionable intelligence for law enforcement agencies and the Mohave County Attorney's Office
- Free customer service systems for inmates – lightens workload of facilities staff
- Monitoring inmate calls. It is anticipated that implementing caps on rates, fees and single-payment products, the volume of calls will drastically increase. This will most likely result in doubling staff hours to monitor and manage the inmate phone system
- Training jail personnel and law enforcement officers how to use the inmate phone system, to include each of the security features
- Litigation resulting from inmates regarding the use of the phone system

I would like to make mention that a few inmate phone providers proposed that the FCC eliminate commissions, but it is my professional opinion that recommendation did not take into account the aforementioned details. Thank you for understanding my concerns and the complexities associated with providing phone services to the Mohave County Sheriff's Office inmate population.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim McCabe", with a long horizontal flourish extending to the right.

Jim McCabe
Sheriff